

April 9, 2014

Mr. Charles David Abshire (6SF-AP)
Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2773

RE: March 2014 Monthly Report
United States of America and State of Texas v. Alcoa, Inc., et al.; CA No. 3:12-cv-00210
Malone Service Company Superfund Site - Texas City, TX

Dear Mr. Abshire:

On behalf of the Malone Cooperating Parties (MCP), in compliance with and pursuant to the Consent Decree (CD) and Statement of Work (SOW) for Remedial Design/Remedial Action (RD/RA) at the Malone Service Company Superfund Site in Texas City, TX, attached please find the Monthly Report for March 2014.

Should you have any questions, please contact me at 919-539-1928 or bobp@projectnavigator.com.

Sincerely,

R Piniewski

Robert Piniewski
Project Coordinator

cc: Marilyn Long - TCEQ
Malone Cooperating Parties

**MALONE SERVICE COMPANY SUPERFUND SITE
MONTHLY PROGRESS REPORT FOR MARCH 2014
SUBMITTED APRIL 14, 2014**

1) SUMMARY OF WORK PERFORMED IN MARCH 2014

- a) The MCP submitted its response to Agency comments on the draft Phase One Remedial Action (RA) Work Plan and, upon EPA approval, the Final Phase One RA Work Plan and a revised Storm Water Management Plan.
- b) PNL, ENTACT and MCP representatives prepared for mobilization for Phase One RA work.
- c) MCP representatives prepared for mobilization for cemetery relocation work.
- d) MCP representatives continued planning for injection well rehabilitation work and reissuance of the No Migration Exemption.
- e) MCP representatives continued stormwater management activities at the Site.

2) SUMMARY OF SAMPLING/TESTING RESULTS

- a) None.

3) DELIVERABLE STATUS & MODIFICATIONS TO PLANS

- a) A summary of the most recent Agency Communication is shown in Table 1.

4) POTENTIAL PROBLEM AREAS and ACTIONS TO BE TAKEN

- a) None.

5) COMMUNITY RELATIONS ACTIVITIES

- a) MCP representatives will support EPA's community relations efforts as requested by EPA.

6) CHANGE IN PERSONNEL OR OPERATIONS

- a) None.

7) SCHEDULE

- a) The Phase One RA Work Plan contains the project schedule.

8) PROJECTED WORK FOR NEXT TWO REPORTING PERIODS (APRIL and MAY 2014)

- a) Mobilize and begin Phase One RA work.
- b) Mobilize and begin the field efforts for the Cemetery Relocation.
- c) Continue stormwater management activities at the Site.
- d) Prepare WDW-138 and WDW-73 Rehabilitation Work Over Procedures for EPA review. Complete WDW-138 and WDW-73 Rehabilitation Work Over Procedures once approved by EPA.
- e) Prepare the petition for renewal of the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells.
- f) Conduct Mechanical Integrity Test and Temperature Log for WDW-138 and WDW-73 once rehab activities are complete
- g) Submit a request to shift installation of the slurry wall and dewatering system from Phase Two to Phase One work.

Table 1
Recent Agency Communication Summary
Malone Service Company Superfund Site – Texas City, TX

Date	MCP Communication Summary	Response From EPA Date	EPA Communication Summary	Notes
10/16/13	Via email the MCP, under Section XIX (Force Majeure) of the governing Consent Decree, notified EPA that due to the government shutdown and other circumstances there would be a delay in the submission of the Phase One RA Work Plan. The MCP will provide the information prescribed by Paragraph 74 of the Consent Decree once the government shutdown has ended and the MCP has been able to consult with EPA regarding various technical issues and the schedule going forward.	pending		
12/9/13	Submitted written request for approval for 45 day schedule extension for submittal of the draft Phase One Remedial Action Work Plan.	pending		
12/20/13	Submitted draft Phase One Remedial Action Work Plan and appendices including the Phase One Remedial Design Investigation Report.	1/31/14	EPA comments received on 1/31/14.	
1/31/14	MCP received EPA and TCEQ comments on Phase One Remedial Action Work Plan	n.a.		
2/13/14	PNL notified EPA that in response to a petition filed by representatives of the MCP the Galveston County District Court ordered that any remains in the cemetery at the Malone Site be removed to a perpetual care cemetery. The court also ordered removal of the cemetery dedication. Further permits will be obtained from the State Registrar as needed.	Noted.	MCP provided EPA a copy of the Court Order on March 6, 2014.	
2/19/14	MCP representatives and EPA discussed the MCP's intent to prepare a petition to renew the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells, and to perform well rehabilitation at WDW-73 and WDW-138 to increase injection capacities to permitted levels. The MCP also requested postponement of Mechanical Integrity Testing (MIT) and 5 year temperature log testing until after well rehabilitation work is complete. EPA requested a review of well rehabilitation procedures and agreed to postpone MIT and 5 year temperature log until after the rehabilitation	2/19/14	EPA requested a review of well rehabilitation procedures and agreed to postpone MIT until after the rehabilitation.	

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Recent Agency Communication Summary
Malone Service Company Superfund Site – Texas City, TX

Date	MCP Communication Summary	Response From EPA Date	EPA Communication Summary	Notes
2/20/14	The MCP notified EPA that it has completed the second required payment of \$12 million to the Malone Site Trust (held by Bank of New York Mellon) pursuant to Section 3(b) of the Malone Service Company Superfund Site Trust Agreement.	n.a.		
3/3/14	The MCP submitted its responses to Agency comments on the draft Phase One Remedial Action (RA) Work Plan.	3/4/14	EPA approved the response to comments via email.	
3/4/14	The MCP received information from EPA to facilitate the approval/reissuance of the No Migration Exemption for the injection well.	n.a.		
3/6/14	The MCP submitted a copy of the order of the Galveston County District Court granting our motion for summary judgment on the petition for removal of remains and removal of the cemetery dedication regarding the cemetery area at the Malone Site.	n.a.		
3/10/14	The MCP submitted the Final Phase One RA Work Plan and Storm Water Management Plan V1.	3/25/14	EPA approved the Phase One RA Work Plan.	
3/25/14	The MCP notified EPA and TCEQ that ENTACT will mobilize to the Site on April 7, 2014 to begin Phase One RA work and that MCP representatives will also be mobilizing on April 7, 2014 to begin cemetery relocation work.	n.a.		